Estimate of F	easonable BNYM Defense	DS 1000#14	LO162: Coldborg	建性等 Ente	reg::09/10/2/19913:155:1559 De 1 Rage 1 of 1	880:	
		本本語の記憶のである。 Lower reasonable estimate		reasonable estimate	Higher reasonable estimate	Higher reasonable estimate	
			(\$)	(# of hours)	(\$)	(# of hours)	
Attorney Fe	es						
Case Assessn	nent						
	Fact Investigation	\$	600,000	750	\$ 1,200,000	1500	
	Analysis/Strategy	\$	288,000	360	\$ 480,000	600	
	Experts	\$	160,000	200		400	
	Other	\$	64,000	80	•	160	
		\$	1,112,000	1390	\$ 2,128,000	2660	
Pleadings & I	1	1 -		ı			
	MTD	\$	1,463,200	1829		2270	
	Answer	\$	232,000	290		410	
	MTS/MTD	\$	184,000	230		300	
	Conferences	\$	86,400	108		171	
	Summary Judgment	\$	1,808,000	2260		3580	
	Other	\$	96,000	120		240	
		\$	3,869,600	4837	\$ 5,576,800	6971	
Discovery				ı			
	Fact - Written	\$	257,600	322		473	
	Fact - Doc Prod/Review	\$	2,775,000	*	7 4,702,300	**	
	Fact - Depositions (40)	\$	2,880,000	3600		4600	
	Expert	\$	1,472,000	1840		2840	
	Motions	\$	249,600	312	•	624	
	Other/Misc	\$	624,000	780		1560	
		\$	8,258,200		\$ 12,840,100		
Trial				ı			
	Motions & Submissions	\$	1,120,000	1400		2100	
	Fact witness prep	\$	800,000	1000		1500	
	Expert witness prep (8)	\$	768,000	960		1280	
	Mock Trial	\$	320,000	400		500	
	Trial (10 days)	\$	640,000	800		1920	
	Post-trial	\$	292,800	366		510	
		\$	3,940,800	4926	\$ 6,248,000	7810	
Appeal		\$	740,800	926		1389	
Re-trial		\$	1,970,400	50% trial		50% trial	
Re-appeal		\$	370,400	50% appeal		50% appeal	
	Fees Total	\$	20,262,200	l	\$ 31,583,700		
Expenses							
TVACIISES	Experts	\$	1,050,000		\$ 2,100,000		
	Paralegals	\$	1,350,000		\$ 2,100,000		
	Local counsel	\$	500,000		\$ 2,023,000		
	E-discovery vendor	\$	500,000		\$ 1,000,000		
	Deposition costs	\$	144,000		\$ 1,000,000		
	Jury consultants	\$	500,000		\$ 1,000,000		
	Puerto Rico travel	\$	300,000		\$ 1,000,000		
	Misc	\$	125,000		\$ 250,000		
	Expenses Total	\$	4,469,000		\$ 8,167,000		
	LAPENSES FOLUI		4,403,000		3,107,000		
	Fees + Expenses Total	\$	24,731,200		\$ 39,750,700		
	* 4500 doc-review atty by	rs (\$350) and 15	00 hlandad-rata hrs /¢	800)			
	* 4500 doc-review atty hrs (\$350) and 1500 blended-rate hrs (\$800) ** 6750 doc-review atty hrs (\$350) and 3000 blended-rate hrs (\$800)						
	0730 doc-review atty i	07.50 doe review dity in 5 (2550) died 5000 biended rate in 5 (2000)					